

EXHIBIT 1

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by restricted appearance

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD,

Plaintiff,

v.

Amis Integrity S.A., *in personam* and M/V
AMIS INTEGRITY (IMO 9732412) her
engines, freights, apparel, appurtenances,
tackle, etc., *in rem*,

Defendants.

Case No. 3:19-cv-1671-BR

IN ADMIRALTY

**DEFENDANT AMIS INTEGRITY'S
RESPONSES AND OBJECTIONS TO
PLAINTIFF'S FIRST
INTERROGATORIES AND
REQUESTS FOR PRODUCTION**

TO: Dry Bulk Singapore Pte. Ltd., Plaintiff

AND TO: David R. Boyajian and Kent Roberts, Schwabe, Williamson & Wyatt, P.C.,
Attorneys for Plaintiff

GENERAL OBJECTIONS

Defendant Amis Integrity S.A., by restricted appearance, ("Defendant") responds to

AMIS INTEGRITY'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION - Page 1
[Case No. 3:19-cv-1671-BR]

Plaintiff Dry Bulk Singapore Pte. Ltd.'s Interrogatories and Requests for Production (the "Requests") subject to the general objections set forth below. These general objections form part of the response to each request as though fully set forth therein. The general objections may be specifically referenced in response to a request for the purposes of clarity; however, failure to specifically reference a general objection may not be construed as waiver of the objection.

1. Defendant objects to the Requests to the extent they purport to impose upon Defendant a duty or obligation contrary to, or beyond that permitted or required by, the Federal Rules of Civil Procedure and the District Court Local Rules.

2. Defendant objects to any definition or instruction provided by Plaintiff that attempts to require Defendant to provide a response beyond that which would be required using the reasonable, common and ordinary definitions for each word.

3. Defendant objects to the Requests to the extent they seek work-product, trial preparation materials and/or communications protected by the attorney/client privilege, or any other applicable privilege held by Defendant. Inadvertent disclosure of such documents or information shall not constitute waiver of any privilege or any other grounds for objection.

INTERROGATORIES AND REQUESTS FOR PRODUCTION

INTERROGATORY NO. 1: What is Wisdom Marine's relationship to Defendants Amis Integrity SA and M/V AMIS INTEGRITY.

ANSWER: Defendant objects to Interrogatory No. 1 to the extent "Wisdom Marine" is vague and ambiguous as there are multiple "Wisdom Marine" entities. Subject to and

without waiving the objection, Wisdom Marine Lines S.A., is the parent company of Amis Integrity S.A., and the manager of the M/V AMIS INTEGRITY under the current charter party.

INTERROGATORY NO. 2: What role did Wisdom Marine play in the withdrawal of the M/V AMIS INTEGRITY under the 24 Vision/Amis Integrity, SA charter party dated June 30, 2017.

ANSWER: Defendant objects to Interrogatory No. 2 to the extent “Wisdom Marine” is vague and ambiguous as there are multiple “Wisdom Marine” entities and the reference to the charter party is vague and ambiguous to the extent it does not include subsequent extensions and/or “recaps.” Subject to and without waiving the objections, Wisdom Marine Lines S.A. directed the withdrawal of the M/V AMIS INTEGRITY from the charter party with 24Vision Chartering Solutions for failure to pay charter hire, including authoring a July 8, 2019 notice of intent to withdraw and July 12, 2019 notice of withdrawal.

INTERROGATORY NO. 3: Please list the names of individuals at Wisdom Marine and/or Amis Integrity SA who were involved in the withdrawal of the M/V AMIS INTEGRITY from the Amis Integrity SA/24Vision charter party and identify their respective roles in such withdrawal.

ANSWER: Defendant objects to Interrogatory No. 3 to the extent “Wisdom Marine” is vague and ambiguous as there are multiple “Wisdom Marine” entities. Subject to and without waiving the objection, the withdrawal was handled by Curly Tsao, the operations PIC for Wisdom Marine Lines Co., Ltd., and Huan Jang, the Section Chief of the Business

and Operations Department for Wisdom Marine Lines Co., Ltd. Tina Lai, Mr. Tsao's supervisor, and Mike Chao, COO of Wisdom Marine Lines Co., Ltd., were also involved and aware of the withdrawal.

INTERROGATORY NO. 4: Please identify all communications between Wisdom Marine and/or Amis Integrity SA (and/or others acting on their behalf) and 24Vision Chartering Solutions DMCC (hereinafter "24Vision") with respect to the withdrawal of the M/V AMIS INTEGRITY on or about July 11, 2019.

ANSWER: Defendant objects to Interrogatory No. 4 to the extent "Wisdom Marine" is vague and ambiguous as there are multiple "Wisdom Marine" entities and to the extent it implies that the M/V AMIS INTEGRITY was withdrawn from the charter between Amis Integrity S.A. and 24Vision Chartering Solutions on or before July 11, 2019. Defendant asserts that the M/V AMIS INTEGRITY was timely withdrawn on July 12, 2019. Subject to and without waiving the objections, Defendant refers Plaintiff to the email correspondence produced in response to Request for Production 1 (Originally Request 4 a.) and provides the following summary. The following summary is not intended as a substitute for the emails produced hereunder, but is merely intended to identify responsive communications: On July 8, 2019 Curly Tsao by email provided a Grace Period Notice of intent to withdraw the Vessel from the charter party between Amis Integrity S.A. and 24Vision Chartering Solutions for failure to pay charter hire, and received confirmation of transmission; on July 12, 2019 at 13:56 and 14:00 (Taiwan time) Mr. Tsao by emails provided notice of withdrawal directly to 24Vision Chartering Solution and via broker Eddie Lin; on July 12, 2019 at 14:36 (Taiwan

information as the Vessel was properly withdrawn from the charter party between Amis Integrity S.A. and 24Vision Chartering Solutions for failure to pay charter hire. Subject to and without waiving the objection, United Bulk Carriers International S.A.

REQUEST FOR PRODUCTION NO. 5: Please provide copies of the charter agreement, fixture note, or other writing memorializing the charter and the negotiations leading up to such charter/fixture, together with copies of all exchanges of correspondence related thereto.

RESPONSE: Renamed "Request for Production No. 5" for clarity. Defendant objects to Request for Production No. 5 (originally Request 7 a.) to the extent negotiations leading to the subsequent charter of the Vessel and any related charter party and correspondence are irrelevant as the Vessel was properly withdrawn from the charter party between Amis Integrity S.A. and 24Vision Chartering Solutions for failure to pay charter hire. Subject to and without waiving the objection, please see documents produced in response to Request for Production No. 3 (originally Request 5 a.)

DATED this 15th day of November, 2019.

LE GROS, BUCHANAN & PAUL

By: s/ Markus B.G. Oberg

By: s/ Daniel J. Park

MARKUS B.G. OBERG, OSB #112187

DANIEL J. PARK, OSB #132493

Attorneys for Defendant Amis Integrity S.A.
by restricted appearance

VERIFICATION

HSUEH, BRUCE YICHUN verify in accordance with the Supplemental Rules for Admiralty or Maritime Claims as follows:

That I am an officer of Defendant Amis Integrity S.A. in the above-entitled action. I acknowledge that I have read the foregoing interrogatories and answers thereto, know the contents thereof, believe the same to be true and correct, and verify, under perjury of the Laws of the United States of America, that the foregoing is true and correct.

AMIS INTEGRITY S.A.

By:  _____

CERTIFICATE OF SERVICE

The undersigned certifies that on this day she caused to be served in the manner noted below, a copy of the document to which this certificate is attached, on the following counsel of record:


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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct this 15th day of November, 2019.

By: 
Gabrielle A. Flanagan, Paralegal
Signed at Seattle, Washington